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Personality Gym AB

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

* * *

PERSONALITY GYM AB,

Plaintiff,

vs.

SHANDONG AOCHUANG FITNESS
EQUIPMENT CO., LTD. and JOHN DOES
1-30,

Defendants.

CASE NO.

**COMPLAINT FOR PATENT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

Plaintiff Personality Gym AB ("Personality Gym") alleges as follows, upon actual knowledge with respect to itself and its own acts, and upon information and belief as to all other matters:

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INTRODUCTION

Personality Gym brings this case for infringement of U.S. Patent Nos. 11,602,661 (“the ’661 Patent”), 11,865,397 (“the ’397 Patent”), and 12,076,606 (“the ’606 Patent”) (collectively, the “Asserted Patents”) pursuant to 35 U.S.C. § 101, *et seq.*, specifically, 35 U.S.C. §§ 271 and 281-285.

THE PARTIES

1. Plaintiff Personality Gym is a Swedish corporation organized and existing under the laws of the Country of Sweden with a principal place of business at Östermalmsgatan 42, 114 26 Stockholm, Sweden. Personality Gym has a subsidiary company, NÜO Athletic Innovation, Inc. (“NÜO”), which is a Texas corporation having a principal place of business at 661 E. Main Street, Suite 200, Box 237, Midlothian, Texas 76065.

2. Upon information and belief, Defendant Shandong Aochuang Fitness Equipment Co., Ltd. (“AOC”) is a Chinese company with a principal place of business at Zhengyang Road, Ningjin Development Zone, Ningjin County, 253400 Dezhou City, Shandong Province, China. Upon further information and belief, AOC is a manufacturer and wholesaler whose business includes developing, manufacturing, and selling fitness equipment for worldwide commercial use, including within the United States.

3. Upon information and belief, John Does 1-30 are companies and/or individuals whose respective businesses includes making, using, selling, offering for sale and/or importing fitness equipment for commercial use within the United States.

JURISDICTION AND VENUE

4. This action arises under the patent laws of the United States, codified at 35 U.S.C. § 1 *et seq.*, and in particular 35 U.S.C. §§ 271 and 281-285, and is a civil action for patent infringement.

5. This Court has original jurisdiction over the subject matter of Counts One through Four under 28 U.S.C. §§ 1331 and 1338(a), as this case involves AOC’s infringement of the Asserted Patents.

1 6. Upon information and belief, this Court may exercise personal jurisdiction
2 over Defendants AOC and John Does 1-30 by virtue of Defendants committing acts of patent
3 infringement in the State of Nevada which Defendants knew or should have known would
4 cause injury in Nevada. This Court has personal jurisdiction over Defendants because, upon
5 information and belief, AOC and John Does 1-30 have conducted business and have directly
6 harmed Personality Gym in this District by using, selling, offering for sale and/or importing
7 products that infringe the Asserted Patents.

8 7. Defendant AOC is also subject to personal jurisdiction in this District as AOC
9 is offering products for sale at the Health and Fitness Association (“HFA”) Trade Show held
10 March 11-14, 2025, at the Mandalay Bay Convention Center in Las Vegas, Nevada.

11 8. Upon information and belief, John Does 1-30 are retailers of sporting
12 equipment, including infringing adjustable dumbbells, who are purposefully availing
13 themselves of the consumers and companies in the state of Nevada, including offering for sale
14 adjustable dumbbells infringing the Asserted Patents.

15 9. Venue in the United States District Court for the District of Nevada is proper
16 under 28 U.S.C. § 1391(b)(2) because, on information and belief, a substantial part of the
17 events or omissions giving rise to Personality Gym’s claims occurred in the District of
18 Nevada. Pursuant to LR IA 1-6, venue lies in the unofficial Southern Division of this Judicial
19 District.

20 10. Venue in the United States District Court for the District of Nevada is also
21 proper under 28 U.S.C. § 1391(c)(3) because AOC and certain of the John Doe defendants are
22 foreign companies subject to nationwide venue.

23 **GENERAL ALLEGATIONS**

24 ***Personality Gym’s Adjustable Dumbbell Patents***

25 11. Personality Gym owns the ’661 Patent entitled “Adjustable Weight Lifting
26 Device” which was filed in the United States as U.S. Patent Application No. 17/772,605 on
27 April 28, 2022, claims priority to International PCT Application No. PCT/EP2020/064878,
28 filed May 28, 2020, and issued as a United States patent on March 14, 2023. The sole

1 inventor, Tomas Svenberg, assigned the patent application for the '661 Patent to Personality
2 Gym. A copy of the '661 Patent is attached as Exhibit 1.

3 12. Personality Gym's patented adjustable dumbbells save space in a gym by
4 taking the place of large sets of standard dumbbells and save time by quickly changing
5 dumbbell weight by twisting the tube or handle. The patented, adjustable dumbbells have
6 been a great commercial success for Personality Gym and its United States licensees and
7 distributors.

8 13. The '661 Patent claims an adjustable weight lifting device comprising a tube, a
9 pin, and one or more driving knobs. The pin, which is movably disposed inside the tube,
10 comprises an external thread wherein the external thread further comprises at least one portion
11 having a first helix angle and at least one portion having a second helix angle such that the
12 second helix angle is smaller than the first helix angle. The driving knob(s) of the device
13 extend radially inward relative to an inner wall of the tube and engage with the external thread
14 to drive changes in weight.

15 14. Personality Gym owns the '397 Patent entitled "Adjustable Weight Lifting
16 Device" which was filed as U.S. Patent Application No. 18/107,734 on February 9, 2023, as a
17 division of U.S. Patent Application No. 17/772,605 and claiming priority to May 28, 2020.
18 The '397 Patent issued as a patent on January 9, 2024. A copy of the '397 Patent is attached
19 as Exhibit 2.

20 15. The '397 Patent claims an adjustable weight lifting device comprising a tube, a
21 housing, and an index ring. The housing of the device has an axially inner portion that is
22 nonrotatably attached to the tube at a first end of the tube and an axially outer portion that is
23 rotatable relative to the axially inner portion. The axially inner portion comprises an axially
24 inner portion face gear facing the axially outer portion, whereas the axially outer portion has
25 an axially outer portion face gear facing the axially inner portion. The index ring of the
26 device comprises an exterior surface provided with indicia and an inner surface. The
27 adjustable weight lifting device further includes one or more gears or cogwheels mounted on
28 the inner surface of the index ring for rotation about one or more corresponding radially

1 extending axes. Each radially extending axis is perpendicular to a longitudinal axis of the
2 index ring, and each gear or cogwheel meshes with the axially inner and axially outer portion
3 face gears to identify with indicia on the index ring the weight of the adjustable dumbbell.

4 16. Personality Gym owns the '606 Patent entitled "Adjustable Weight Lifting
5 Device" which was filed as U.S. Patent Application No. 18/519,847 on November 27, 2023,
6 as a continuation of U.S. Patent Application No. 18/107,734 and claiming priority to May 28,
7 2020. The '606 Patent issued as a patent on September 3, 2024. A copy of the '606 Patent is
8 attached as Exhibit 3.

9 17. The '606 Patent claims an adjustable weight lifting device comprising a tube, a
10 cylindrical member disposed in the tube, a first housing, and a second housing. The tube and
11 the cylindrical member are rotatable relative to each other and axially fixed relative to each
12 other. The first housing has an axially inner portion nonrotatably attached to the tube at a first
13 end of the tube and an axially outer portion nonrotatably attached to the cylindrical member at
14 a first end of the cylindrical member. The second housing has an axially inner portion
15 nonrotatably attached to the tube at a second end of the tube and an axially outer portion
16 nonrotatably attached to the cylindrical member at a second end of the cylindrical member to
17 assist in adjusting the weight of the adjustable dumbbell.

18 18. AOC sells and offers for sale in the United States, including at the 2025 HFA
19 Trade Show in Las Vegas, Nevada, one or more adjustable dumbbell products and has sold
20 adjustable dumbbell products that infringe the Asserted Patents in Nevada.

21 19. The adjustable weight lifting devices claimed in the Asserted Patents feature
22 unique and inventive technology, which has revolutionized adjustable dumbbells for both
23 home and professional gym use by reducing space and the total number of weights required
24 for the user. The innovative adjustable dumbbell technology provides controlled weight
25 mounting and dismounting. For example, by turning the handle in the middle of the
26 adjustable dumbbell, the dumbbell adjusts by adding weights in the form of disks at either end
27 of the handle. Rotating the handle in one direction adds additional disks to the handle, while
28 reversing the rotation of the handle in the opposite direction removes disks. This rotating

1 handle feature allows the user to easily and efficiently adjust how many weight disks are
2 loaded onto the handle using only a single hand.

3 ***Personality Gym's Business***

4 20. Personality Gym, and later NÜO, was founded by Tomas Svenberg, a former
5 member of Sweden's national rowing team. Together with professional engineers and
6 designers, Svenberg and his team developed and launched a smart dumbbell, branded the
7 FLEXBELL®, in 2006.

8 21. After the 2006 product launch of FLEXBELL®, Personality Gym continued to
9 develop its adjustable dumbbell and other fitness equipment products and acquired a strong
10 presence in Europe by attending the Internationale Fachmesse für Sportartikel und Sportmode
11 ("ISPO") Trade Show in Munich, Germany, in 2009.

12 22. In 2020, the well-known FLEXBELL® was rebranded as the NÜOBELL®.
13 The upgraded version of the NÜOBELL® adjustable dumbbell includes more accessible
14 features such as 2-kg weight disks/weight increments instead of the previous 4-kg weight
15 disks/weight increments as well as the claimed elements from the '661, '397, and '606
16 Patents.

17 23. In 2022, Personality Gym and its subsidiary NÜO opened its first online store
18 for the European market and eventually expanded its business into the United States in 2023
19 by opening an online store. Personality Gym also sells its adjustable dumbbells to resellers
20 and has engaged with reselling entities in the United States since 2023.

21 24. Personality Gym currently holds many patents related to its adjustable
22 dumbbells, including the patent family initiated by International PCT Application No.
23 PCT/EP2020/064878 ("the PCT Application") filed on May 28, 2020. The U.S. national
24 phase filing of the PCT Application (U.S. Patent Application No. 17/772,605) issued as the
25 '661 Patent on March 14, 2023, followed by the '606 and '397 Patents which issued on
26 September 3, 2024, and January 9, 2024, respectively.

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AOC's Infringing Conduct and Ensuing Chinese Litigation

25. In 2021, Per Svenberg, Personality Gym's Chief Financial Officer and Chief Intellectual Property Officer, first learned about AOC, its manufacture of adjustable dumbbells at its factory in Shandong, China in the city of Dezhou, and its sale of these products through the online marketplace Alibaba (<https://www.alibaba.com/>).

26. Defendant AOC claims on its website that it has "been at the forefront of the fitness equipment industry" "[w]ith over 20,000 square meters of state-of-the-art production facilities."

27. On March 23, 2023, a Personality Gym representative made a notarized purchase of AOC's round and octagonal adjustable dumbbells online at Alibaba's website. Personality Gym received both sets of dumbbells on March 27, 2023, as shown on the respective shipping labels of the delivered boxes

28. After receiving the shipment, Personality Gym dismantled both sets of dumbbells and determined that AOC's round adjustable dumbbell with the adjustable weight lifting device embodied in Personality Gym's adjustable dumbbell patents, including in Personality Gym's Chinese Patent No. CN 114245754, which is a counterpart of the Asserted Patents, infringed CN 114245754. Personality Gym determined that the AOC adjustable dumbbell was a copy/knock-off of the NÜOBELL adjustable dumbbell.

29. The AOC adjustable dumbbell, which was recently sold and offered for sale in the United States, meets all the elements of at least each independent claim of each of the Asserted Patents. Moreover, the weight adjustment method employed in AOC's round adjustable dumbbell is with the same the weight adjustment system and method embodied in the NÜOBELL® adjustable dumbbell. The comparative analysis further demonstrates that the interior of AOC's round adjustable dumbbell includes all features of the adjustable weight lifting device as claimed in the independent claims of the Asserted Patents.

30. Specifically, one of the principal features of Claim 1 of the '661 Patent and the NÜOBELL® adjustable dumbbell is the incorporation of pins with external threads having two different helix angles allowing for the rotation of the handle to lock the set of weight

1 disks at the opposing ends of the dumbbell. The deconstructed AOC round adjustable
 2 dumbbell shows pins with external threads where the external threads have two helix angles,
 3 thus demonstrating that AOC copied the NÜOBELL® adjustable dumbbell by reverse-
 4 engineering the novel adjustable weight lifting technology into its knock-off products.

5 31. On June 7, 2023, Personality Gym sent a cease and desist letter to AOC in
 6 which Personality Gym informed AOC that it manufactures and sells adjustable dumbbells
 7 under the NÜOBELL® trade name and warned AOC of its patent protection in China (*i.e.*,
 8 CN 114245754). The letter provides a side-by-side photograph comparison of Personality
 9 Gym's adjustable weight lifting device claimed in CN 114245754 and AOC's round and
 10 octagonal adjustable dumbbells, and alleges that AOC is suspected of infringing Personality
 11 Gym's Chinese patent.

12 32. Personality Gym eventually commenced a patent infringement litigation in
 13 China, and that case is currently pending.

14 ***AOC's Ongoing Patent Infringement***

15 33. On April 11, 2024, AOC attended the Financial Industry Business Ontology
 16 ("FIBO") Trade Fair, the world's leading health, fitness and wellness trade show held in
 17 Cologne, Germany. AOC and its representatives presented, exhibited, and offered for sale
 18 adjustable dumbbells and other fitness equipment at booth 8D73. AOC's booth and the
 19 adjustable dumbbells displayed and offered for purchase at the fair are set forth below:

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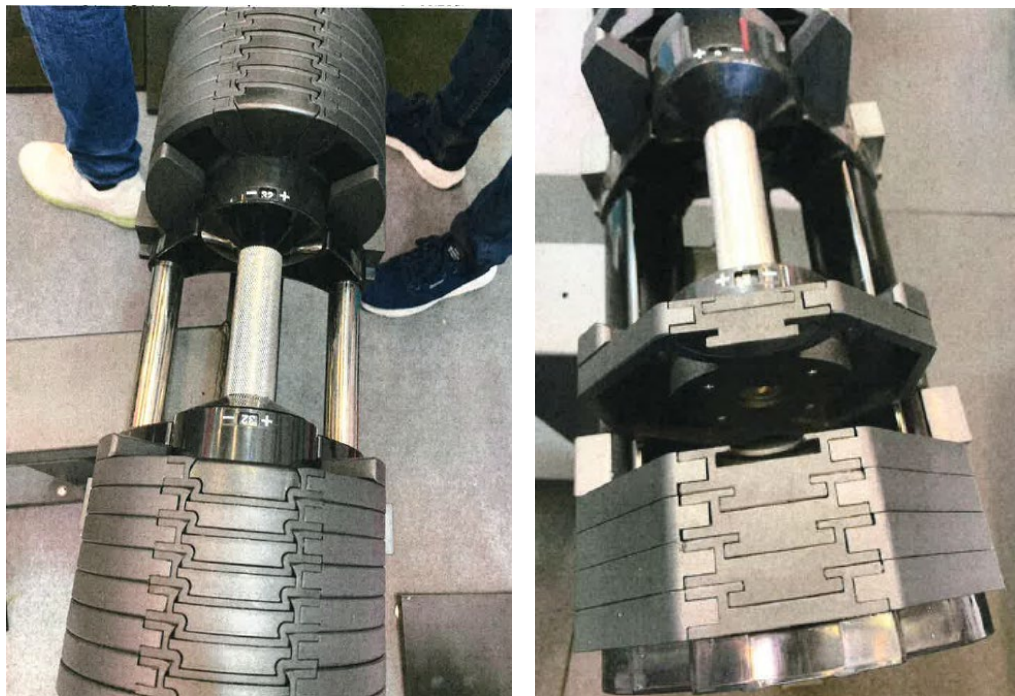
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AOC's Booth at the FIBO Trade Fair on April 11, 2024

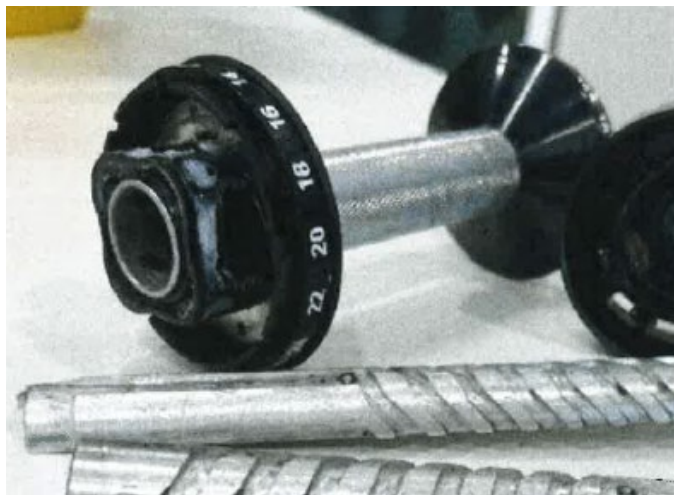


AOC's Round (left) and Octagonal (right) Adjustable Dumbbells on Display

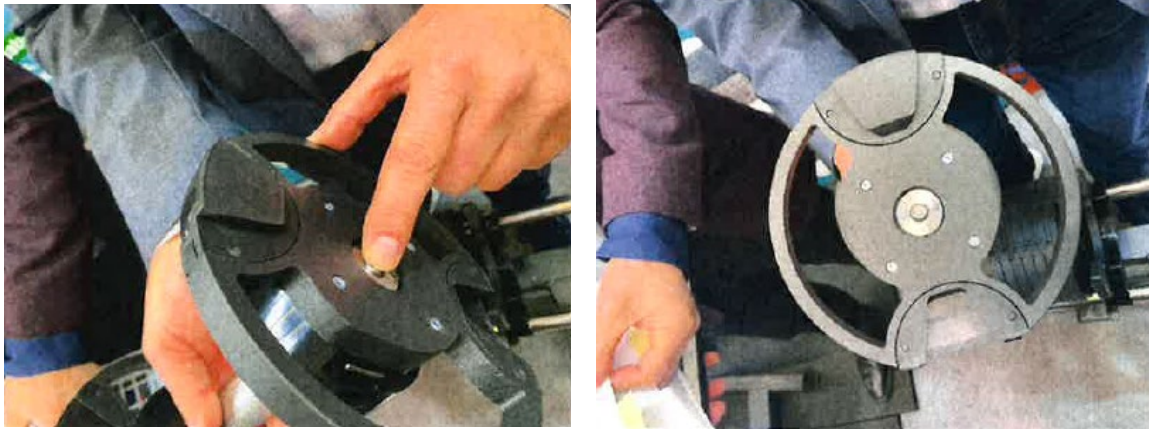
34. As demonstrated by the above photographs, the round adjustable dumbbells displayed by AOC are virtually identical to the NÜOBELL® and incorporate the same weight adjustment method and characteristic features as those claimed in the Asserted Patents.

35. Personality Gym promptly contacted the public prosecutor's office in Cologne, and the Cologne police seized AOC's products from the fair on April 11, 2024. Personality Gym also sought and obtained the intervention of the German Court in Cologne to enforce a patent infringement determination against AOC for selling and offering for the sale the round and octagonal adjustable dumbbells. Despite being served with formal process, however, AOC failed to appear before the German Court and defaulted.

36. The adjustable dumbbells manufactured by AOC and displayed at the fair were subsequently dismantled by representatives of Personality Gym. Photographs of the dismantled adjustable dumbbells and their features are set forth below, demonstrating the slavish copying of Personality Gym's NÜOBELL adjustable dumbbell by AOC's adjustable dumbbell. Specifically, the deconstructed AOC adjustable dumbbell shows the molding marks which are unique to the NÜOBELL® adjustable dumbbell and which would not otherwise exist if AOC independently designed its adjustable dumbbells.



AOC's Dismantled Round Adjustable Dumbbell



Molding Marks on AOC's Round Adjustable Dumbbells

37. The adjustable dumbbells seized by Personality Gym at the FIBO Trade Fair are identical to the dumbbells previously purchased by Personality Gym on Alibaba's website on March 23, 2023, and otherwise remain completely consistent with the weight adjustment method embodied in the Asserted Patents and the NÜOBELL®.

AOC Pursues Infringing Sales of Knock-Off Adjustable Dumbbells in the U.S.

38. Personality Gym provides notice to the public of patent protection covering its NÜOBELL® adjustable dumbbell technology and innovation, including through its website at <https://nuoathletics.com/pages/patents>.

39. Personality Gym marks its NÜOBELL® adjustable dumbbells with U.S. Patent No. 11,602,661, including virtually at <https://nuoathletics.com/pages/patents>. Accordingly, AOC has constructive knowledge and, upon information and belief, actual knowledge that the NÜOBELL® adjustable dumbbells marketed and sold by Personality Gym and NÜO are subject to patent protection in the United States.

40. Despite this knowledge, AOC offers to sell, has sold and continues to sell infringing adjustable dumbbells in the United States.

41. Upon information and belief, AOC also sells the Accused Products to third parties including John Does 1-30 for the purposes of resale in the United States and other jurisdictions.

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42. On March 7, 2025, AOC sold a round adjustable dumbbell advertised as “32KG Adjustable Dumbbell with Top Quality and Competitive Price” on Alibaba’s website to a private investigator for delivery in this District. The Accused Product was purchased by the private investigator on Alibaba’s website (<https://32kg Adjustable Dumbbell With Top Quality And Competitive Price - Buy Adjustable Dumbbell 32kg Adjustable Dumbbell dumbbell Product on Alibaba.com>).

43. AOC markets the Accused Product to United States buyers on its website (<https://aocfit.com>) as well as through Facebook, YouTube, TikTok, and Alibaba’s website (<https://32kg Adjustable Dumbbell With Top Quality And Competitive Price - Buy Adjustable Dumbbell 32kg Adjustable Dumbbell dumbbell Product on Alibaba.com>). On information and belief, AOC made substantial sales of its knock-off products at prices substantially below the prices of Personality Gym’s NÜOBELL® adjustable dumbbells.

John Does 1-30 Offer to Sell and Sell Infringing Adjustable Dumbbells Online and in Person directed to the State of Nevada

44. Upon information and belief, John Does 1-30 import, offer to sell, and/or sell infringing adjustable dumbbells in the United States and in the State of Nevada.

45. Each John Doe offers to sell infringing adjustable dumbbells incorporating all elements found in at least Claim 1 of the ’661 Patent.

46. Certain John Does are offering for sale infringing adjustable dumbbells at the HFA trade show on March 11-14, 2025 in Las Vegas, Nevada.

47. The offers to sell and sales by John Does 1-30 are knowing and willful and are causing immediate and irreparable harm to Personality Gym.

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COUNT ONE:

KNOWING AND WILLFUL INFRINGEMENT OF THE '661 PATENT

48. Personality Gym realleges and incorporates by reference the allegations set forth in paragraphs 1 through 47 of this Complaint.

49. The claims of the '661 Patent are presumed valid and enforceable pursuant to 35 U.S.C. § 282.

50. Upon information and belief, AOC has infringed and is currently infringing at least Claim 1 of the '661 Patent, either literally or under the doctrine of equivalents, in violation of 35 U.S.C. § 271 by making, causing to be made, importing, selling, offering for sale, including an online sale directed to Nevada, or using without authority the Accused Products.

51. Upon information and belief, AOC has been and is currently willfully infringing at least Claim 1 of the '661 Patent by making, causing to be made, importing, selling, offering for sale, or using the Accused Product within the United States that infringes the '661 Patent.

52. On information and belief, AOC acted and is continuing to act with actual and constructive knowledge of the '661 Patent and willfully infringing the '661 Patent. AOC has actual knowledge of the patent family initiated by the PCT Application, including the '661 Patent, from its prior correspondence with Personality Gym, from seizure of its infringing adjustable dumbbells by German police and from the ongoing patent infringement litigation of CN 114245754 in China. AOC also has constructive knowledge of the '661 Patent because Personality Gym marks the NÜOBELL® product as patent protected under U.S. Patent No. 11,602,661.

53. As a result of AOC's willful infringement of the '661 Patent, Personality Gym has been damaged to an extent not yet determined.

54. Personality Gym is entitled to monetary damages adequate to compensate it for infringement by AOC of the '661 Patent, together with trebling of damages, interest, costs, and attorneys' fees.

1 55. Personality Gym has been and will continue to be irreparably injured by
2 AOC's conduct. Personality Gym has no adequate remedy at law. Plaintiff is entitled to
3 injunctive relief prohibiting AOC from further infringing Personality Gym's '661 Patent.

4 **COUNT TWO:**

5 **KNOWING AND WILLFUL INFRINGEMENT OF THE '397 PATENT**

6 56. Personality Gym realleges and incorporates by reference the allegations set
7 forth in paragraphs 1 through 55 of this Complaint.

8 57. The claims of the '397 Patent are presumed valid and enforceable pursuant to
9 35 U.S.C. § 282.

10 58. Upon information and belief, AOC has infringed and is currently infringing at
11 least Claim 1 of the '397 Patent, either literally or under the doctrine of equivalents, in
12 violation of 35 U.S.C. § 271 by making, causing to be made, importing, selling, offering for
13 sale, including an online sale directed to Nevada or using without authority the Accused
14 Products.

15 59. Upon information and belief, AOC has been and is currently willfully
16 infringing at least Claim 1 of the '397 Patent by making, causing to be made, importing,
17 selling, offering for sale, or using the Accused Product within the United States that infringes
18 the '397 Patent.

19 60. On information and belief, AOC acted and is continuing to act with actual and
20 constructive knowledge of the '397 Patent and willfully infringing the '397 Patent. AOC has
21 actual knowledge of the patent family initiated by the PCT Application, including the '397
22 Patent, from its prior correspondences with Personality Gym, from seizure of its infringing
23 adjustable dumbbells by German police and from the ongoing patent infringement litigation
24 of CN 114245754 in China. AOC also has constructive knowledge of the '397 Patent because
25 Personality Gym marks the NÜOBELL® adjustable dumbbell product as patent protected
26 under U.S. Patent No. 11,602,661, the parent application for which the '397 Patent claims
27 priority as a division.

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61. As a result of AOC's willful infringement of the '397 Patent, Personality Gym has been damaged to an extent not yet determined.

62. Personality Gym is entitled to monetary damages adequate to compensate it for infringement by AOC of the '397 Patent, together with trebling of damages, interest, costs, and attorneys' fees.

63. Personality Gym has been and will continue to be irreparably injured by AOC's conduct. Personality Gym has no adequate remedy at law. Plaintiff is entitled to injunctive relief prohibiting the AOC from further infringing Personality Gym's '397 Patent.

COUNT THREE:

KNOWING AND WILLFUL INFRINGEMENT OF THE '606 PATENT

64. Personality Gym realleges and incorporates by reference the allegations set forth in paragraphs 1 through 63 of this Complaint.

65. The claims of the '606 Patent are presumed valid and enforceable pursuant to 35 U.S.C. § 282.

66. Upon information and belief, AOC has infringed and is currently infringing at least Claim 1 of the '606 Patent, either literally or under the doctrine of equivalents, in violation of 35 U.S.C. § 271 by making, causing to be made, importing, selling, offering for sale, including an online sale directed to Nevada, or using without authority the Accused Products.

67. Upon information and belief, AOC has been and is currently willfully infringing at least Claim 1 of the '606 Patent by making, causing to be made, importing, selling, offering for sale, or using the Accused Product within the United States that infringes the '606 Patent.

68. On information and belief, AOC acted and is continuing to act with actual and constructive knowledge of the '606 Patent and willfully infringing the '606 Patent. AOC has actual knowledge of the patent family initiated by the PCT Application, including the '606 Patent, from its prior correspondences with Personality Gym, from seizure of its infringing adjustable dumbbells by German police and from the ongoing patent infringement litigation

1 of CN 114245754 in China. AOC also has constructive knowledge of the '606 Patent because
2 Personality Gym marks the NÜOBELL® adjustable dumbbell product as patent protected
3 under U.S. Patent No. 11,602,661, the parent application for which the '606 Patent claims
4 priority as a continuation of the '397 Patent.

5 69. As a result of AOC's willful infringement of the '606 Patent, Personality Gym
6 has been damaged to an extent not yet determined.

7 70. Personality Gym is entitled to monetary damages adequate to compensate it for
8 infringement by AOC of the '606 Patent, together with trebling of damages, interest, costs,
9 and attorneys' fees.

10 71. Personality Gym has been and will continue to be irreparably injured by
11 AOC's conduct. Personality Gym has no adequate remedy at law. Plaintiff is entitled to
12 injunctive relief prohibiting the AOC from further infringing Personality Gym's '606 Patent.

13 **COUNT FOUR:**

14 **INJUNCTIVE RELIEF**

15 72. Personality Gym realleges and incorporated by reference the allegations set
16 forth in paragraphs 1 through 71 of this Complaint.

17 73. AOC's actions in making, causing to be made, importing, selling, offering for
18 sale, or using the Accused Product that infringes the Accused Patents have caused and
19 continue to cause immediate and irreparable harm to Personality Gym.

20 74. Monetary damages cannot fully remediate the harm AOC is causing and will
21 continue to cause in the future because of the difficulty for Personality Gym to identify all of
22 AOC's sales or attempted sales and execute a judgment against AOC since AOC does not
23 have a business in the United States and sells its adjustable dumbbells through Alibaba's
24 online marketplace.

25 75. Further, AOC's actions of copying Personality Gym's patented adjustable
26 dumbbell by reverse-engineering the NÜOBELL® adjustable dumbbell has injured and will
27 likely continue to injure Personality Gym's and NÜO's reputation by misleading and

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1 confusing consumers regarding the quality of Personality Gym's and NÜO's weight lifting
2 equipment products.

3 76. As a result of AOC's infringement of the Asserted Patents, Personality Gym
4 will continue to suffer immediate and irreparable harm unless the Court immediately and
5 permanently enjoins AOC's making, causing to be made, importing, selling, offering for sale,
6 or marketing of the Accused Product that infringes the Asserted Patents, including at the HFA
7 Trade Show at the Mandalay Bay Resort in this District, pursuant to 35 U.S.C. § 283.

8 **PRAYER FOR RELIEF**

9 WHEREFORE, Plaintiff Personality Gym asks this Court to enter judgment against
10 Defendant AOC and against John Defendants 1-30, granting the following relief:

- 11 a. A judgment that Defendants are liable for infringement of the Asserted Patents;
- 12 b. A decree that Defendants' infringement of the Asserted Patents was willful and
13 deliberate;
- 14 c. An award to Personality Gym and against Defendants of damages that are
15 adequate to fully compensate it for Defendants' infringement of the Asserted
16 Patents, together with prejudgment interest and costs, including enhanced
17 damages for any willful infringement under 35 U.S.C. §§ 284 and 285;
- 18 d. A permanent injunction enjoining Defendants and those active in concert or
19 participation with Defendants from infringing the Asserted Patents during the
20 respective terms of the patents;
- 21 e. An award of such other and further relief, at law or in equity, as the Court may
22 deem just and proper.

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DEMAND FOR JURY TRIAL

Pursuant to FRCP 28, Personality Gym hereby demands a trial by jury on all issues for which a trial by jury may be had.

DATED this 13th day of March 2025.

SALTZMAN MUGAN DUSHOFF

By /s/ Joel Z. Schwartz

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